

EDVA/SCO Interview of Rob Kelner; June 21, 2018

James P. Gillis ("G") (AUSA-EDVA);
Robert Kelner ("R")
Evan Turgeon ("ET") (NSD) (JMD);
Brandon Van Greck ("BVG");
Bryan T. Alfredo, (WF) (FBI);
Bruce Baird ("BB")
Roger Polack

G: Dive right in; tell us . . . drift outside the scope; no hard feelings, let me know. Not trying to get you.

BB: On page 2.

G: Right, yes, all questions within scope but reasonable minds may differ; if so speak up.

G: what were all the sources of information, including witnesses and docs that reviewed or spoke to that used to complete the Jan 11, 2017 letter and then FARA filing itself

R: All is a broad word. will to the best of recollection try to catalog.

Jan 11: at the time to the best of rec sources of factual information were:

1. had conducted an interview of General Flynn
2. conducted an interview of Bijan Kian
3. reviewed documents that had been collected to date; G: by whom? docs had been collected passive tense. who collected and from where?
 - a. not sure who collected in detail; had a team working on that. had a Covington team. won't necessarily be able to reconstruct here now. here's best of recollection: believe there was a set of emails and perhaps accounting records that were collected by MF's son, Michael Flynn Jr. who worked for FIG. know we obtained them later, but believe obtained them from MG before Jan 11 letter.
 - b. In terms of how they were conveyed; some may have been from Kristen Verdame, via MG. who's counsel was she? She was counsel to FIG and MF personally prior to our being engaged in FARA matter.
 - c. Possible that either Brian Smith or Alex Langton received documents directly from MG at that time, but don't recall with precision.
 - d. Also had some public records such as LDA that had been filed by FIG, which were available online.
 - e. Had they both been filed at that time? Evan: yes, by Dec 1
 - f. Rob continues: may be that at that time had started to collect encrypted emails and documents; this is something may ask Brian about. But FIG used something called Virtru, FIG had largely shut down ops by this time; were no longer using Virtru; created significant challenges in collecting these docs. Had begun an effort to collect those; not sure how much progress made by Jan 11. Believe were

- principally relying on docs MG had collected. Also possible, that had received emails from Bijan Kian. Doesn't recall if was before Jan 11.
- g. To be clear - the collection of emails and documents, something not personally involved in, was supervising the team.
 - h. ET: Who was involved. R: Brian Smith and Alex Langton.
 - i. R: At that time we were primarily interfacing with Kristen, recall that docs may have gone through Kristen.
 - j. R: At that period and really through the date of FARA filing, some of our communications were with Kristen Verderame.
4. R: In terms of other sources of information that had prior to Jan 11 letter: Did have some comms with MG. G: Interviews? R: No, to the best of recollection did not conduct a formal interview of MG at that time. But he attended interview of MF; do not recall him contributing anything material to the best of recollection; but he was there. Was referring that making an effort to collect documents and think that Kristen was interacting with MG at that time, possible that AL or BS had communicated directly with MG at that time. Before the Jan 11 letter; bulk of focus was collecting docs given the limitations of Virtru.
 5. R: Before we move on, because you asked very broad "all" question. Let me think of any other sources that I can recall. Certainly spoke a number of times with KV; some part of convos would've included her sharing factual info that she knew in part based on a meeting she conducted based on meeting she conducted with Bijan and MG. Do not have a clear recollection of what she conveyed to us about her prior meeting, partly because it overlapped with what we were learning anyway.
 6. BVG: Pre Jan 11, in terms of interviews with FIG, was just General Flynn and Bijan, was that it?
 7. R: To best of recollection, yes.
 8. G: Mention that . . .
 9. R: I'll mention that at some point we interviewed Boston, believe was after Jan 11 letter, but not certain of that.
 10. G: Ok, so FIG...
 11. R: At some point also believe interview Bob Kelly, and recognition is that interviewed same day as Boston, but believe it was after.
 12. G: Mention that FIG had shutdown ops at that time, and because encryption of emails, having trouble getting them or getting docs. Was computer system of FIG still in existence; had it been wiped; was it still around.
 13. R: Short answer is Brian will know those better than me. All I understood at the time is because had shutdown FIG, neither they nor FIG had shut down FIG, did not have ready access to Virtru files. Exact tech details, doesn't recall.
 14. G: Know whether comps or systems still exist?
 15. R: Don't know for sure whether still exist; leave it at that. To be clear about that, anything that we actually gained access to has been preserved by us.
 16. G: Would be correct to presume that if comps existed at time, they would still exist?
 17. R: Give best recollection, but vague and uncertain. Recollection is used cloud-based system, that virtru was a cloud-based system. Not sure FIG had FIG-owned devices they were using. When talking about Virtru talking about receiving those docs from cloud.

For the record, Virtru had counsel, which was Morrison & Forrester; so may be in better position than I.

18. G: Do you have contact info. R: Believe we can track that down; I was not engaging with them at that time.
19. G: Besides Brian and Alex, were there others who had significant role in Covington team, others have role in collection?
20. R: At that time may have had other help from Covington technical staff, but don't believe had other lawyers or paralegals.
21. G: As an aside, if wanted to interview Alex or IT folks; would that be possible.
22. B: Not today, but at another time sure. R: not sure had IT folks.
23. G: Can fill in recollection after interview.
24. Move onto FARA filing . . .
25. B: What's the question?
26. G: What were all the source of information that Covington used to complete the FARA filing?
27. R: At some point, we interviewed Mike Boston, one of the FIG employees, and interviewed Bob Kelly; think it was in interview between letter and filing, but could've been before filing; interviewed Bijan Kian a second time. Collected additional documents through Virtru. Believe collected docs from Mike Boston. At some point, did focus interview of MG; believe it was before March 7 filing to best of recollection. I did not participate in that interview so less clear. G: Who did? R: Believe the interview was conducted by Brian Smith and Steve Anthony. Not certain that it was before March 7 filing; may have also been later. And if it was after filing, would not have concerned gathering information for the filing.
28. G: Sorry, just to be clear, talking about might be before or after FARA filing. Now talking about more formal interview of MG. R: Yes.
29. R: Spoke with counsel for Ekim Alptekin. G: Who was that? Believe was Matthew Nolan @ Arendt Fox Firm. R: Most of conversations were either between Brian Smith and Matt Nolan or between KV and Matt Nolan. Also emails to and from Matt containing factual information. Some may have been transmitted through KV or may have been group email chain.
30. G: Emails to MN? R: Either emails to or from that we were on. In an effort to collect information for FARA?
31. BVG: Were ever in JDA with Ekim's lawyer? BB: Beyond scope; BVG: can follow up later.
32. R: Other sources; Spoke with Sphere and Sphere's counsel; at time counsel was Ben Ginsburg at Jones Day. Gracin Yeargin from JD.
33. ET: When say spoke with Sphere; just counsel or principals?
34. R: At least one call with each Graham Miller and Jim Court...
35. R: Other sources of information, had some public records that we had collected. Any particular that stand out? R: Not really in the scope.
36. B: Any particular public records that used in the filing? R: Can't remember whether any ultimately impacted the filing. Brian may have recollection on that.
37. G: Exhaust recollection? Yes.
38. BVG? Brian McCauley?

39. R: Thank you; believe talked to Brian McCauley before March 7 filing. Either before or after filing did interview Brian McCauley. Also informal communications KV had with her client. Some information would be filtered through to us via Kristin.
40. BVG: Tim Newberry and White Canvas group?
41. R: I don't recall our interviewing Newberry, but not certain. Brian may remember.
42. G: So, at anytime were you aware of... you include in your FARA filing the agreement between Inovo and FIG, and it doesn't mention a payback or kickback, any payment from FIG back to Alptekin; were you aware of such a payment agreement before the filing?
43. R: In terms of the factual information that was made available to us, we were provided with accounting records that reflected payments from FIG to Inovo. Believe also had in our possession the draft contract between FIG and Alptekin. G: This 20 percent back agreement?
44. R: We were aware of the draft agreement to provide payment.
45. BVG: When say draft is it because was never executed by both parties?
46. R: That's right; we did not have an executed copy.
47. G: Ever ask anyone about that payment?
48. R: Not sure want to say what we asked. If question is, did anyone give us information about that contract, answer is yes. In interview with Bijan, he told us that the payments to Inovo were refunds because Alptekin was upset that FIG had not provided PR and lobbying services that he had expected to receive. And because he was upset about that he wanted his money back and that was genesis of payments to Ekim. WRT consulting agreement itself, and trying to stick to what he just said to us -- my best rec is that he did not view that contract as having been fully executed and performed under.
49. BB: What did he say; try to remember what he said.
50. R: I don't have a crisp recollection of what he said about contract. What I do recall is that he focused on what the payments back were; he strongly viewed those as refunds and not consulting fees.
51. BVG: What did he say about why they were logged into FIGs accountng records as consulting fees?
52. R: Could not offer explanation. Believe he said he was not the one who kept those records or would've recorded it that way.
53. BVG: What did he say around those comms that do not describe them as a refund?
54. R: My rec is that there were two elements to his response: 1 - he doesn't always choose the right words in emails. 2 - there had been some discussion about using Ekim as a consultant, but that it hadn't come to fruition. didn't deny that concept of ekim being consultant came up; but described it not coming to fruition. said that ekim did not render consulting services and that payments were refunds.
55. G: run that by me again. He talked about these emails with you? He talked about these emails with me.
56. G: He explained those emails as sloppy drafting? R: My best recollection is: BB: One is doesn't choose his words right, and consultant never came to fruition.
57. BVG: Broaden out question... being aware that there was a lot of email traffic on this. What else did Bijan say wrt to these two payment that you can recall?
58. R: Nothing more than call recall, unless you have something in mind.
59. BVG: Did he offer an explanation of why the payments of 40k were made so close in time to Ekims own payments to FIG.

60. R: Do not recall him offering an explanation for that?
61. BVG: Did he offer an explanation for why these payments were made to Inovo and not to Alptekin.
62. R: Not that I recall.
63. BVG: Did he offer an explanation of why FIG produced paperwork / document sent back explaining that they were for consultant fees.
64. R: Either did not offer an explanation for it; or he offered an explanation that I'm forgetting at the moment, or that we had a reaction to that I will not address as attorney work product;
65. R: In general, in discussing the 40k payments and the contract with Ekim and related correspondence, Bijan's response was to focus on the fact that payments were refunds and consulting arrangement never came to fruition.
66. BFG: Refund was for consulting arrangements not rendered?
67. R: Refunds were for PR and lobbying that were expected and that FIG did not do.
68. BVG: What did Bijan, or how did Bijan describe the lobbying work that had been done over life of project?
69. R: He may not have used the word lobbying to describe it. But at some point, he described for us, congressional contacts during innovo contract. Including comms with stagger named Miles something.
70. BVG: But did indicate he had contact with Congress or staffers in relation to this contract.
71. R: He described that meeting with Miles Something as principally being about other topics unrelated to Turkey and Inovo but during the course of the meeting, made reference to Turkey.
72. BVG: Recall any other mention of bringing up the topic of Turkey with Congressmen or staffers? With Rohrbacher?
73. R: At some point became aware of contacts with Rohrbacher, but as sit here today not sure when became aware of that.
74. G: From Kian became aware of that?
75. R: Don't believe I had a convo with Kian about Rohr; believe it came out through review of email traffic or in comms with KV. I don't recall how RB came up or even if it came up before or after filing, G: or if it came through Kian. R: I don't recall
76. G: So is that more or less your recollection of data for FARA filing.
77. ET: Recall him mentioning any other Congressional contacts during period of contract.
78. R: as is sit here today, not as I recall.
79. G: About draft consulting agreement that I understand you had before FARA filing, did he say anything about why they would do it that way, with these two separate agreements rather than taking 40k ... R: No. G: Okay he did not. I'm trying to understand, whether basically it just never came up and didn't offer an explanation; or whether he was asked by someone.
80. G: Was his failure to provide an explanation given in the context of responding to a question that was asked? Can he answer that? BB: Sure. R: It came up.
81. G: On that subject, did it come up in any other discussions with anybody else before the FARA filing?
82. BB: In other words did anyone offer an explanation why it was done that way?

83. R: So, MF before the FARA filing, to best of recollection, MF was not able to offer any explanation of the \$40k payments. Just going from my memory, will leave it at that.
84. G: WRT why there were two agreements instead of just reducing that payment, did it come up with MF before FARA filing? R: It came up. G: And in that context unable to provide explanation? R: Correct
85. BVG: Did Bijan ever indicate that there was a benefit to FIG to describing these as consulting fees other than refunds. R: No
86. Did he ever say there was a benefit to Ekim to describe them as consulting agreement versus refund? R: No
87. R: Have some additional recollections to information he provided on this, when preparing the actual FARA filing, my recollection is one of the few objections that Bijan raised, was that he objected to the filing that draft showed these as consulting fees and they should say refunds. Believe he discussed this with Ekim, and Ekim was upset or would be upset if they were described as consulting fees.
88. BVG: What explanation did Bijan provide for why each payment was reduced from 200 to 185 185 to X? R: Don't believe he offered an explanation for that.
89. BVG: Did he explain why Ekim did not receive a 3rd payment of 40k? R: May have come up but if so I don't recall his answer.
90. G: As far as... Did subject of draft consulting fee, did why was done that way come up in any other discussion or interview that you had?
91. R: Don't recall it coming up in any other interviews. I think topic came up only in our interviews with Bijan and MF. Strike that. Believe it came up in a discussion with MG, and he had very little information about it other than to say that he did keep the accounting records. Believe he indicated that he would have been the one to record it. He also recalled Bijan instructing him to wire funds to Ekim, but didn't recall any explanations than what was in the email to MG.
92. BVG: No recollection of the Bijan describing the wires as refunds?
93. R: He did not recall that; just from time to time Bijan would ask him to wire funds and this was one such example.
94. BVG: Did anyone else that you talked to including MF state or indicate that they were aware that there had been PR or lobbying services that had not been performed under the contract.
95. R: Not that I recall.
96. BVG: Or anything that would indicate why the refund was being given to Ekim?
97. R: Not that I recall.
98. G: with regard to emails received that are facts in which you based the letter and filing, with regard to emails, assume they were never produced, or maybe shouldn't assume that.
99. G: There I'm talking about emails Cov received.
100. R: Fair to assume that emails Cov received from FIG employees regarding were not produced, but would need to review our productions to state with precision.
101. G: In these interviews been discussing, did you personally take notes?
102. BB: Think that's beyond the scope.
103. R/G: Defer that issue. Okay, let's defer.
104. G: Just so questions are clear, want to know whether witness took notes, and then would also ask whether there was a record like the ones I'm typing and whether the witness reviewed those notes.

105. BB: Seems to me can ask what information, but not as how it was recorded or how it was recorded. What would really like to know is if there is some way recollection could be refreshed?
106. G: Yes, sort of that. Also, contemporaneous notes. Also aware that notes themselves are work product. Understand none of this applies to docs. Not debating whether covered by ACP; might debate whether its work product whether he took notes or not. But can table that for another time.
107. BB: If end up with something in particular that you need, can talk about that.
108. G: I don't have some profligate interest in receiving all of them. Would want them more from the facts that are taken down for that meeting. If the work product privilege didn't apply would be discoverable. But can come back to them.
109. G: to the extent you were able in preparing the FARA filing, believe that you had all of the emails... I'm stuck... may be mental impression, trying to get at your understanding is that you received or did request all of the emails that were available from Bijan, Ekim, and MF.
110. R: Not sure that would be the case.
111. G: All that would be relevant to the FARA filing.
112. R: It's a bit difficult to answer without getting into work product. Let me just say that I am not necessarily certain that had every email in existence from the people you mentioned.
113. G: know that some weren't because of Virtru issue. but apart from that issue, did you try to obtain all of the emails that related in anyway to this project.
114. R: I think that starts to get into work product. If the question is what info we received, we received emails. I don't have certainty. Don't think I can address the steps we took, why we took them, without trying to get into work product. Are you trying to clarify if we know that something was withhold.
115. G: I have to assume being the excellent lawyers you are, collected everything.
116. BB: I think we have to defer because there all types of dynamics with your client when dealing with this, sometime you think you have everything, sometimes you don't/
117. G: What about with respect to Ekim?
118. R: To the best of my knowledge, did not receive Ekim's emails or text messages. what we received was information volunteered by counsel, or answers to questions we posed to his counsel. Obviously not a FIG employee so didn't have the same relationship with other FIG employees whose emails we were collecting.
119. G: Did you mean to limit it at that you received information from his counsel but not documents?
120. R: I don't recall receiving his emails, but recall receiving a letter from his counsel, and emails from his counsel responding to questions we received.
121. G: Poorly written . . . not Covington after all.
122. G: Apart from that letter or emails that came from Ekims lawyers; that's basically what you received from Arent Fox.
123. R: yes, with clarification that don't think received emails from Ekim forwarded by his lawyer. Received answers from Ekim's lawyer, don't believe that any of them were conveying a written response from Ekim.
124. G: So you were not communicating directly with Ekim?
125. R: We were not.

126. G: So you were posing questions to the lawyer? Yes. Would lawyer say, Ekim says?
127. R: I don't recall. Certainly gave us the impression that he had gone back to client was giving us the response. Don't recall if he said "here is what my client said:"
128. G: Would you regard those emails as work product Bruce?
129. BVG: When talked last week, are there any docs that had been withheld, that pursuant to the letter that shouldn't have been withheld. Based on this discussion or based on this letter should have been produced.
130. R: We had a follow-up conversation with G until after this discussion, talked about redactions. So maybe ID those instances, but come back to it.
131. G: I didn't have a crystal clear convo about what we talked about. Thought maybe permissible to ask about what docs there are.
132. R: I'm answering some of those.
133. BVG: My only point is that we should have a discussion, based on this, what docs that we would be interested in and get your position.
134. G: In the course of preparing either the letter or FARA, did you review the LDA?
135. R: Yes we did review it.
136. G: Did you interview anybody discuss with lawyers?
137. BB: Sounds outside the scope. It's the information that was given?
138. R: Is it what information was shared with us regarding the LDA filing? G: Yes.
139. R: Bijan told us that he had relied upon FIG's GC Bob Kelly to advise WRT to the LDA filing and to prepare the LDA filing. MF told us that he understood from Bijan that Bijan had worked with BK on the LDA filing. As to what Bob Kelly told us...
140. BB: Was there factual information that he gave that you used?
141. R: There was no factual information that he gave us that we used. I can say what he addressed. What prompted the LDA filing and what information he included in the LDA filing.
142. G: If you would say so, what is it that he told you.
143. R:

See handwritten notes for this section (Rob was using my computer)

Return to below after handwritten notes

144. ET questions: Who reviewed drafts of FARA filing other than counsel?
145. R: Bijan, MF, and staff of FARA registration unit, from whom we solicited comments.
146. ET: Did Kelley review a draft?
147. R: I don't believe threat he did, but can't be certain/
148. ET: Of those people, what comments did any reviewers make to you before it was filed.
149. R: Don't recall any comments from MF, believe the draft report was provided to MF through KV. Don't recall any comments from MF.

150. ET: Did KV provide comments of her own?
151. R: She did provide feedback.
152. ET: What was her feedback?
153. R: Would be work product.
154. G: Was it written or oral?
155. R: There was written and oral feedback. Just for completeness and precision. At least for a brief period of time, KV also participated in writing the FARA filing.
156. G: Something to noodle about, to the extent the emails come from her, they wouldn't represent what you thought was relevant or not relevant.
157. ET: Who from Cov was involved in drafting FARA filing?
158. R: Alex Langton, Brian Smith, Rob, depends on what you mean by writing, if mean who would've provided substantive input, Steve Anthony.
159. ET: Who from outside including Kristin was involved in drafting or providing substantive input?
160. R: Other than Kristen and FARA unit, don't think anyone outside of Cov, and only feedback was from KV and Bijan.
161. ET: What feedback than Bijan provide, other than consulting fees to refunds?
162. R: Objected to that fact that in some fashion the FIG filing was going to disclose Jim Woolsey's role in the contract; was reference in Inovo contract to former CIA director, which people could find out easily was Woolsey.
163. ET: What was basis for objection?
164. R: Would be upset, didn't participate other than one phone call and Sep 19 meeting. Also on short form registration form, there is a reference to kickbacks in the official form itself; he objected to that word being on the filing. Don't know whether it was initially on the form as opposed to something we had written.
165. ET: did he elaborate why it was objectionable.
166. R: Yes, don't remember in detail, but he misconstrued it as a reference to a political contribution he had made, which on the short form we were disclosing; was a contribution to then Congressman Zinke, made it look like was a kickback.
167. G: Plus also a contribution to Make America Great, which thought was a little cheap.
168. R: May have been other comments or objections, but those are the ones I remember.
ET: what form were they provided.
169. R: By email and at one point I was scheduled to be on a call with him together with KV to listen to his objections; can't clearly remember whether was on that call or whether it took place; possible it took place that it happened and was not on it; possible I was and don't remember. Just to be clear Bijan provided answers to various questions by email, but here we're talking about corrections.
170. BVG: In answering some of our questions over last two hours, did you segregate the email comms from the interview comms?
171. R: Did not segregate, but do not remember all of the particulars of the email; if there was something relevant from an email I would have included it in my answers today.

172. ET: Series of statements from the filing. Questions are going to be about the source of the factual information. Representation that the foreign principal was Inovo. What was factual source of the information.
173. R: Gets into work product, have many sources of information; the decision of how to put it, where to put it, how to phrase it, necessarily took into account how to answer the question.
174. BB: Sources would be everything we talked about.
175. ET: The fact that Inovo engaged FIG a private company in Israel, where did you get information that an Israeli company was engaged?
176. R: Says in the filing itself, letter from Arent Fox.
177. BVG: What did Bijan say about the Israeli company's involvement?
178. R: Don't recall Bijan having any information.
179. BVG: Did the conversation come up?
180. R: Believe it would have, but don't remember as I sit here. Believe it would have come up but don't recall.
181. BVG: What awareness or knowledge did MF have regarding Inovo - Israel company?
182. R: Don't believe he had any knowledge.
183. BVG: But it came up?
184. R: Don't believe it came up until it was a topic in the media, after FARA filing.
185. BVG: Did anyone other than Arent Fox indicate that Inovo had dealings with Israeli company?
186. R: Not that I recall.
187. BVG: Outside of this letter, did Arent Fox make any other reps regarding Israeli company?
188. R: Not to me; Brian may have had other convos.
189. G: By the way, MF said that his understanding that this project was always about Gulen, true from beginning through to the end. In his mind, The Truth and Confidence were identical; never changed. Engagement never changed. Remained the same throughout. Is that something he relayed to you?
190. R: No, as I said earlier when question came up in those emails with Turkish government, did not indicate having a memory of those early exchanges. When you asked MF this the other day was with the benefit of hindsight.
191. G: When you got this letter from Arent Fox, this was on behalf of an Israeli company, did you ask MF this question?
192. R: As I said, think it as unlikely we did.
193. BVG: and no comments or questions regarding the filing about the Israeli company?
194. R: No comments and questions, but might look at exactly how it's worded.
BVG: I appreciate that.
195. ET: What information did you receive about weekly update calls, the status of the project before March 7.

196. R: Recall MF Saying there had been one or two update convos with Ekim, but he did not share very much detail or recall very much detail. Believe that Mike Boston also mentioend the weekly calls. Do not recall what he detailed; do have a clear recollection of him saying government of Turkey had no role in the project. Do not recall whether the weekly convos came up with Bijan.
197. ET: Don't recall asking?
198. R: Do not recall asking him about the weekly update calls; don't want to get into too much detail about why we asked certain things and not others.

EDVA/SCO Interview of Brian Smith; June 21, 2018

Brian Smith ("B"):

Same participants minus Rob Kelner

1. G: What are all the sources of information, witnesses, statements of witnesses, Bijan, and others, that Covington used to complete, first, the letter was sent originally, and the ultimately the FARA filing itself.
2. G: Is this your recollection, if not say so?
3. G: As Part of letter you interviewed MF, Bijan.
4. B: You mean me personally or Cov?
5. G: You
6. B: Started with me and Rob on Jan 2 and then Alex was added mid-January.
7. ET: Steve Anthony?
8. B: Would have been later than filing. no, actually likely Steve would have been involved around time of the filing.
9. G: Who else?
10. B: Others within Cov on the FARA filing or overall?
11. G: Scoping - letter and then FARA filing. So with respect to the team that was involved, understanding some was done by the team, some done by others. Who was in the team. Rob, you, Alex, Steve. Who else?
12. B: I recall that with respect to gathering information for the FARA filing. Other people who would have been involved. Litigation Support. Would've been processing the emails and other documents. Encrypted issue required a lot of help.
13. G: ON that subject, did you get outside expertise on that process.
14. B: Don't believe so. Had a document vendor, don't recall when they came on and whether that was for the later process when we started getting subpoenas. With respect to encryption, don't recall outside help with encryption issue. Occasionally would consult within someone at Covington on questions of law.
15. G: "From the vendor" Virtru provider?

16. B: Yes they had to provide an application that tech people had installed on their computer. And there was a switch they had to turn on their end so that the app our LSS guys could view the documents.
17. G: Did they get involved in decrypting specific documents?
18. B: Don't recall how the technical connections worked.
19. ET: Do you recall name of GC at Virtru that worked with.
20. B: Don't recall. But believe we were speaking with brothers who were COO and CFO, were sons of former Covington partner; maybe Ackerman. Don't recall speaking with their lawyers. Believe we did later, and don't recall whether that was internal or external.
21. G: Emails and accounting had from FIG as well?
22. B: Original Q: did discussion interview with MF and with Bijan, during that time they provided a lot of documents from FIG. Those came from either her or primarily MGF. As you indicated there were other emails; docs; work product.
23. G: Besides interviewing MF or Bijan, others that interviewed in preparation for letter itself?
24. B: Don't believe conducted any other interviews before the filing.
25. G: Did you talk with Ekim?
26. B: No, but spoke with his lawyer.
27. G: From...
28. B: From Arent Fox.
29. G: Did he write that?
30. B: Not sure who wrote that.
31. ET: Where did you get that document?
32. B: Don't remember who sent it to us; know that it came unsolicited, and wasn't able to immediately find it. Memory is that it didn't come directly from him to us.
33. G: Did receive directly mainly from MGF, but also directly from MF and Bijan as well as from KV?
34. B: Don't think that's right. Believe transmissions of documents to me was primarily by Michael G Flynn (MGF) and Kristin Verderame (KV). A lot of stuff from KV was coming via MGF.
35. G: WRT to comms had with Arent Fox, did you understand that some of these were questions that had been put to Ekim or represented Ekim's responses, or were they sanitized so that they just came from the lawyer.
36. B: Don't understand Q.
37. G: Did you receive emails from Nolan?
38. B: Yes
39. G: Did you transmit back follow up Qs?
40. B: Trying to answer this in a way consistent with agreement. Recall that got the Arent Fox memo; had a number of questions about the memo; arranged a call with Nolan; his reps to me in the first call were essentially, he didn't do any factual investigation, that he took the facts as they had been given to him by his client and that was the basis for the memo. He said most comms had not been by Nolan himself, but by his contract lawyer.

41. G: So took facts given by client; did he get facts from any other source?
42. B: She had most of the conversations with Ekim.
43. G: Her name?
44. B: Don't know if ever got her name, Sull or Sully.
45. G: Do you recall whether Nolan himself had direct comms with Ekim?
46. B: My memory is in the first call didn't say one way or the other. IN the second, was explicit that had spoken with Ekim. There were a total of four calls between me and Nolan. And believe that in all of those KV participated and the contract lawyer participated in one of them. Believe that in the 2nd, 3rd, and 4th, said that he had spoken with Ekim and was relaying.
47. G: Did you have any kind of JDA with them?
48. B: No.
49. G: Understanding was the Bijan's email had been shutdown, preserved some sort of archive and that's what got from MGF?
50. B: That's my understanding.
51. G: Who conveyed that?
52. B: Memory is that MGF told me that in the first meeting or over the course of the first few days.
53. G: Is it your understanding that you got all of Bijan's emails to the extent that it still existed?
54. B: Yes with respect to FIG.
55. G: Did get the whole archive?
56. B: For the company?
57. G: For Bijan
58. B: Believe we got the entire archive for Bijan's FIG email.
59. G: If it were on the archive you would've gotten it.
60. B: Yes. I'm making distinction because after FIG email shutdown we received comms from Bijan via personal email.
61. ET: Did MGF do any culling for Bijan?
62. B: Not for Bijan, but for MF, Michael described doing searches.
63. G: How did you get those emails?
64. B: Via electronic upload.
65. G: How about culled MF emails?
66. B: Culled emails most clear in mind where ones provided in hard copy. I don't recall what additional materials we received, would have been after Alex came on and she was working more on doc collection. Must have happened. Hard to separate between collections done before and after FARA filings.
67. G: Do you know whether the Virtru encryption software prevented you from preventing certain emails and docs, or with their help were you able to de-encrypt everything interested in?
68. B: Definitely some that couldn't
69. G: Why was that.

70. B: At some point in the future Virtru stopped cooperating with us. Not around the time of the filing. The way it was explained to me is that if you're an owner of an email their system enables you to see, but if not, it doesn't. Suppose you had the authorization and the capability to de-encrypt Bijan's email, that would not enable you to de-encrypt someone else's email.
71. G: did you understand that KV had done her own interviews of MF and Bijan.
72. B: Never described it that way, when we met on the first day, believe it was 2 jan./ Clear she had already spoken to Bijan and she conveyed some of the factual information he had given to her.
73. G: Did you come aware later that she interviewed MF as well?
74. B: Never explained it that way.
75. G: did she talk to them in order to get a sense of the facts?
76. B: Absolutely
77. G: Do you recall interviewing Michael Boston?
78. B: I did not.
79. G: Do you recall whether he was interviewed?
80. B: Believe it was Alex and Rob, but I was not there.
81. G: Covington interviewed Bob Kelley.
82. B: I did not.
83. G: Do you know whether he was interviewed and by whom, anytime before the FARA filing.
84. B: I know that Covington team members met with him or spoke with him on the phone. Was not part of those discussions and there was at least a couple that I recall.
85. G: You weren't a party to either on of those
86. G: Bijan was interviewed more than once in connection with FARA filing?
87. B: Believe he was interviewed a second time at least, but I wasn't a part of that.
88. G: Do you recall whether you or anyone from Covington had comms with Sphere, its employees or counsel.
89. B: Save the last part no, but had extensive convos with their counsel.
90. G: From Jones Day?
91. B: Yes
92. G: Jason Yergin and Ben Ginsburg
93. B: Yes, I spoke with Gracin and think I was on a call with Ben and believe Rob had calls with them.
94. G: And they rep'd Sphere?
95. B: A few different entities, but yes.
96. G: Did you speak with Jim Court or Graham Miller?
97. B: I did not
98. G: Did Covington speak with them ICW FARA filing?
99. B: I had extensive talks with Gracin and he said he went back to Jim for facts.
100. G: Brian McCauley?
101. B: I did, but 99 percent sure that was after the filing.
102. G: Tim Newberry?

103. B: I did not
104. G: Did anyone at Covington?
105. B: I did, but not to my knowledge. Possible that Kristen did.
106. G: Were you at the time of the FARA filing, or up until the point of the FARA filing, did you see or did you hear of an agreement between Ekim and FIG ICW which FIG was going to be paying Ekim; i.e., payment going in the other direction. Let's call it the consulting agreement. Tell us up to the point of FARA filing, what you know about circumstances of that, what happened with it, was it acted upon, finalized.
107. B: Recall that we were aware of the "consulting agreement." Can't say for sure it was 2 Jan, but by the time we interviewed Bijan on Jan 5. Recall that it was a topic of discussion with Bijan.
108. G: Who brought it up and how did it come up?
109. BB: Beyond scope.
110. G: Besides Bijan, anyone else that described the "consulting agreement"?
111. B: Don't recall whether the agreement per se was discussed in the 2 Jan meeting. Do recall that we discussed the flow of funds, for lack of a better term.
112. G: How did you become aware of the flow of funds?
113. B: Believe the factual details about the payments in both direction came from KV in the 2 January meeting. May have been in materials gathered that MGF gathered.
114. G: Accounting records?
115. B: My memory is that we didn't receive the accounting records until later, but believe that at 2 January some of that data was discussed. Recalls those coming in electronically.
116. G: Who was at 2 Jan meeting?
117. B: Me, Rob, KV, MF, and MGF
118. G: Mentioned that Bijan had talked about this agreement. Was he there?
119. B: No, he wasn't there.
120. G: so to the best of your recollection, that information was provided by KV or MGF.
121. B: Right.
122. G: What were you told about the consulting agreement on 2 January?
123. B: Do not recall anything about the consulting agreement on 2 January.
124. G: But there was a discussion of flow of funds. Was there a conversation of why the back and forth payment, instead of lesser amount.
125. B: There was not.
126. G: Why smiling
127. B: A lot of mental impressions
128. ET: About that particular meeting, who described the flow of funds at that meeting?
129. B: My memory is that, KV outlined the factual information, may have come from paper, or MGF.
130. ET: How was flow of funds described to you?
131. B: Think there was a payment going to FIG, another payment going from FIG, another payment going to FIG and another payment from FIG, and then a lesser amount to FIG as if a payment would have gone from FIG.

132. B: In January 5 from interview from Bijan, he said payment back was from a refund; for performances not performed. And that the agreement you had mentioned before was wholly separate and believe he said not executed. And structure of the agreement was to be tasked by task order, none of which had happened.
133. G: Do you recall receiving at some point the draft agreement?
134. B: Yes, again not sure if got it on Jan 2, but memory is that we had it on Jan 5.
135. G: and it was a refund for not doing PR and lobbying work?
136. B: That's how Bijan described it, yes.
137. G: did the subject of the similarities between the two contracts come up at all?
138. B: Bijan said they were separate.
139. BVG: Did Bijan explain why the monthly payments declined each month?
140. B: No
141. BVG: Did he explain why not a \$40k payment in the third month?
142. B: Don't recall.
143. BVG: There's an email that Cov produced in which he says that it is necessary for an audit trail. Do you recall?
144. B: Yes, He said that, and on Jan 5, that it was necessary because had not amended the contract
145. G: Which contract.
146. B: The main contract. They were refunds for services not performed and because they had not amended the contract, that's what the email referenced.
147. G: In that context was he performing according to the consultant agreement?
148. BVG: First time he documents services rendered, says we need it for an audit trail.
149. G: Held me understand how that makes sense?
150. B: I can only tell you what he said.
151. G: He said because necessary because the contract hadn't been amended? To say what?
152. B: To reflect the fact that there was no lobbying and no PR conducted.
153. G: He didn't offer any other explanation for that audit trail?
154. B: I don't recall anything else.
155. BVG: The Sep 8 contract, indicates the agreement is back dated to Aug 15. Did Bijan explain why backdated to Aug 15?
156. B: No. He indicated that the work had begun around late July.
157. BVG: Did he describe what work was performed in July and August.
158. B: Yes, he said it was assembling the team that was going to work on the project.
159. BVG: Anything else?
160. B: That's what he said they focused on it that time period.
161. G: You were telling me what more you learned about consulting agreement. Did you speak with anyone else about the agreement and the purpose for it.
162. B: Two additional pieces of information. The complete accounting record and the payments appear on there. There was also backup banking/wire instructions, and then in

late January/ early February, one of convos with Nolan, he represented his client's view that these were refunds.

163. G: Did you discuss with him this separate consulting agreement?

164. B: I don't recall that. Might be able to look at notes; don't recall if we talked about contract itself.

165. G: And in the accounting records it says that, I believe, it shows it as consulting fees and not as refunds.

166. B: I believe that's correct.

167. G: did you or covington discuss that with anyone. Entries as consulting fees.

168. BB: Did anyone tell you about them you mean?

169. B: I believe we discussed them all. Again, with Bijan, but that was by email, that was near the end of the process when he was reviewing the near final draft of the FARA agreement,

170. G: What did he say about the payments ICW the FARA filing?

171. B; He continued to say that they were refunds and connecting them with a consulting agreement was inaccurate. Believe that email came through Kristin.

172. G: Was any information about that consulting agreement or the payment or refunds, was that anything you received from MF?

173. B: Only information I recall receiving from MF about the consulting agreement relates to his signature on it and some emails from Bijan asking him to sign it. He either... I'm not 100 percent sure.. well, he did not say to me, I recall facts about signing it.

174. G: Did MF say anything about how the payments were characterized? Whether it was a refund?

175. B: Not that I recall.

176. G: did he say whether knew about them?

177. B: Don't recall him saying one way or the other. Other than general statement that he was very busy with campaign and left a lot of the details with Bijan.

178. G: Did Bijan say anything about how they were characterized about how they were characterized in the accounting records?

179. B: He did not say anything about how they were characterized in accounting records, but he did maintain that they were refunds.

180. G: Do you know who put them into the accounting system?

181. B: No.

182. G: Did MGF say anything about these payments more generally?

183. B: Purpose? How made?

184. G: did he know about them?

B: Yes

185. G: so what did he convey he knew about them?

186. B: Here's the email from Bijan telling me to make the wire payment so I did it.

187. G: and that was pretty much it?

188. B: Yeah

189. BVG: What did Bijan say about the emails that exist that Ekim was going to receive a flat 20 percent fee of any contract that was signed?

190. B: I don't recall him saying anything about that, but don't recall that coming up on Jan 5.
191. BVG: Do you recall the 20 percent email?
192. B: Hazily. It's not a new fact to me, but don't recall much about factual reps related to that.
193. BVG: Did Bijan explain why the 40 k payments were made to Inovo and not Ekim?
194. B: No
195. BVG: Did it come up?
196. B: Not with Bijan
197. BVG: Did it come up with anyone?
198. B: The only facts I recall about that question came from Ekim's lawyer from KV?
199. BVG: what did ekim's lawyer?
200. B: essentially nothing
201. BVG: What did he say?
202. B: Without getting into question asked, Nolan didn't say much.
203. BVG: What about proximity in response to 40k payments and payments to FIG?
204. B: Nothing
205. BVG: Was topic raised?
206. B: There was no explanation given.
207. ET: Did you get any documents from Arent Fox besides letter?
208. B: Don't believe that we did.
209. G: Did you discuss the LDA filing with Bijan?
210. B: Yes
211. G: what do you recall him saying about that? Why it was done that way? Advice he got, anything like that?
212. B: Recall him, in discussion on 5 Jan, recall him saying that had been suggested to him by Sphere, believe he said Jim C., that he get some advice on this question.
213. BVG: What question?
214. B: Don't know that specified; may have said LDA, may have said FARA. And then he called Rob. Or maybe he first called Bob Lindhart. Bob is another partner; first call may have come to Bob, all relayed to me. Came up in Jan 5 conversation. He said that Rob had referred him to some other lawyers and that he had not retained another firm. Had talked to Bob Kelley, believe he described him as GC to the project.
215. BVG: in terms of statement you just made, you recall him saying that. GC to the project and not FIG?
216. B: I do recall that.
217. G: Project being the work for Inovo.
218. B: That's how I understood it. Probably shouldn't say that. He said he talked to Bob, Bob asked him some questions, and said if not a foreign gov or political party can register under LDA. And that Bijan felt they were registering under LDA under an abundance of caution.
219. G: In what way under an abundance of caution?

220. B: On Jan 5, believe he made reference to what talking about before, not going to do lobbying work going to do PR. So why register under LDA if going to do PR. Believe he said we wanted to be able to talk to Congress so filed under LDA.
221. G: So putting those facts together, is it your recollection that at time of LDA, the previously contemplated lobbying and PR work was not going to be done?
222. B: Did not get into that.
223. G: But Bijan said to you b/c not going to be doing any PR work did not have to file.
224. B: No more how I laid out. Bob Kelley said don't have to register b/c not a foreign government political party, not going to lobby, want to be able to talk to people on the hill; going to register out of abundance of caution
225. G: You recall that he made a distinction between lobbying on behalf of Inovo and talking to people in Congress?
226. B: Don't know he made that distinction.
227. G: Ok. Wanted to say that was going to be talking to people in Congress and even though not going to be lobbying, did it out of abundance of caution.
228. B: That's fair.
229. G: At time he discussed refund, did he say they weren't planning on doing lobbying?
230. B: That did not come up.
231. G: Were you involved in obtaining, prep, or review of the declaration of Bob Kelley?
232. B: I was not directly involved. I have seen it.
233. G: Do you know who obtained it?
234. B: Do not know the investigators name.
235. G: But it was an investigator?
236. B: Yes.
237. G: Do you know who did?
238. B: It was Steven Anthony who ran point.
239. ET: Did you have any factual feedback on draft declaration?
240. B: No
241. ET: Are you aware of any factual feedback Covington received on declaration?
242. B: Other than from Mr. Kelley, no.
243. G: Did you say you never spoke with Kelley directly?
244. B: I don't believe I spoke with him.
245. G: Were you aware of a meeting that took place, maybe dinner, that took place in September and Turkish; before the filing were you aware of that/
246. B: yes MF and Bijan described it to me.
247. G: What did MF tell you about it.
248. B: MF described a meeting to which he and others were invited set up by Ekim. And actually did hear about this also by Matt Nolan. So MF described it as meeting set up by Ekim, took place in NY, very late at night, very short. Had difficulty arranging it

based on schedules around UNGA times. It was with him, Bijan, Ekim, Woolsey, a couple Turkish officials, and some other accompaniment people hanging around. He described it as short. Said that the primary topic was radical Islam and shared efforts to fight radical Islam. Briefly described what FIG was doing for Ekim.

249. G: To whom?
250. B: to the Turkish officials.
251. G: So this is in the context of you preparing a response to the FARA inquiry.
252. B: This was the Jan 2 meeting.
253. G: Question of which, would be whether there was direction or control of foreign official?
254. G: Did it come up of whether there was direction, approval, requests, anything like that, by any of these Turkish officials.
255. B: MF did not say that.
256. G: Well did it come up.
257. B: I don't recall that coming up.
258. G: Don't recall it coming up in the context of discussing whether there was direction or control of whether to file under FARA?
259. B: What I recall him describing is what affirmatively transpired in the context of the meeting. I recall him saying that is what had transpired.
260. G: That is that it was very late, very short, Bijan, woolsey, other officials there, main topic was CT, but also briefly described work being done for inovvo.
261. BVG: How did he describe work being done from Inovo?
262. B: Didn't describe
263. G: Recall MF describing anything else at meeting?
264. B: Have a memory of it being described as a meet and greet. The only other thing I recall MF saying is that Turkish officials had brought up the topic of Gulen.
265. G: What about Gulen?
266. B: Don't recall anything other than that; that they had brought up the topic.
267. G: exhausted what MF told you about the meeting with Turkish ministers?
268. G: Did MF say anything to you about contacts FIG had with Turkish officials other than this?
269. B: Yes, there were others who said this.
270. G: Bijan told you there were no other contacts with Turkish officials?
271. B: Yes, believe this was said in the 5 Jan meeting.
272. BVG: Did Bijan or MF ever indicate that was being directed by gov of turkey?
273. B: No
274. BVG: Did ever indicate was for the benefit?
275. B: No
276. BVG: Ever indicate received feedback?
277. B: No, but recalling there contact with a Turkish official ICW the inauguration.
278. BVG: but was anything to do with Inovo?
279. B: No
280. BVG: Did ekim or Nolan ever indicate that was for the benefit, directed or receive feedback.

281. B: No to all. there is a note in the FARA filing that we were aware of convos between Ekim and gov of turkey.
282. BVG: how did nolan describe Turkey government officials?
283. B: Nolan was adamant that Gov of Turkey not involved. Got no money from government, not involved. Adamant.
284. G: Had conversations with MF, Bijan, and Matt Nolan. Can you tell me what Bijan tell you about the meeting with Turkish ministers?
285. B: He had, for the set up, very similar to MF: late at night, hard to organize. Woolsey. McCauley he said that meeting was wholly separate, had nothing to do with confidence, Was an opportunity for turkish officials to meet MF and vice versa, to discuss the mutual fight against radical islam. Remember the comms being one way, Turkish officials were describing and giving information with MF asking questions. He specifically said not in the nature of an update about Confidence.
286. G: Were you familiar with something that was referred to as the truth campaign.
287. B: Yes.
288. G: did you discuss it with Bijan?
289. B: In the Jan 5 interview, Bijan in response to some of the documentation described that that was a separate endeavor that there was discusison about FIG working for the Turkish government on what he called Truth, and that nothing came of it.
290. G: Did he say what the work was that would be for the Turkish government?
291. B: think he described it as fighting radical islam.
292. G: In what way was FIG going to be fighting radical islam?
293. B: don't know.
294. ET: Did he describe that in reference to Gulen?
295. B: Believe he made reference to Gulen but was in contract to Confidence project.
296. G: Did he say that the Truth project and the Confidence Project were completely separate matters?
297. B: correct
298. G: Were you aware of emails that were close to one another about the Truth campaign and confidence thing. Did he try to explain those; fail to explain those; did it come up?
299. B: Recall him saying they were separate. Recall him acknowledging the contemporaneousness of it.
300. G: Brought to his attention
301. G: Acknowledged it?
302. B: He stated that there was no connection.
303. G: Summarizes B's statements on meeting. Also talked with Nolan. What did Nolan tell you about the meeting? Am I right that Nolan was communicating to you was coming from Ekim?
304. B: Said there were four calls; in the second, third, and fourth, began with talked to my client and here is the information.
305. G: What did he tell you.
306. B: trying to disaggregate things. Believe it was relatively later in convos with Nolan where he was responding to things. His description of that meeting recall being

focused on FARA. And that the way he expressed Ekim's view was just bringing together two principles, wasn't working for anyone.

307. G: Focus of meeting was on FARA?

308. B: no meeting was in terms of FARA. Did this meeting trigger FARA. He expressed Ekim's view that meeting was about bringing together two principals, that there wasn't anyone acting as an agent. Continued to express his view and Ekim's view that these activities did not warrant a FARA filing. Look at that memo. Ratio, etc. Getting further into the factual details, talking about Sep 19 meeting, still doesn't trigger FARA.

309. G: Because?

310. B: That this was a meeting bringing together principals; that there wasn't an agent

311. G: What facts did he relay to you if any that it was a meeting of principals?

312. B: I am not sure that what I'm about to say came contemporaneous with that. but did discuss with Nolan that maybe the Turkish government could hire FIG. Not sure that those two paragraphs were right next to each other. Ekim thought maybe FIG could work for Turkey at some point so getting them to work together might be useful.

313. G: Did he describe actually what took place, who was there, what was discussed?

314. B: Believe he expressed most definitively which gov officials were there. There was perhaps some ambiguity about which of the ministers were there.

315. G: so who from Turkey was there?

B: Presumably something ekim would've had knowledge of.

316. G: Who was it then that said Nolan was there?

317. B: Pretty sure what was in the filing. MFA, Energy, Economy, whatever is in the filing is most consistent with what is in the filing.

318. G: Did MF ever mention anything about contacts he had about inauguration?

BTW - what were the inauguration contacts about

319. B: I don't recall

320. G: Were you aware at the time of the FARA filing of any comms between MF and any Turkish officials or other folks from Turkey?

321. B: Not sure how to interpret that.

322. G: DO you recall any emails prior to the FARA filings about communications that MF had with anyone from Turkey other than people at the September meeting?

323. B: Any other contacts meeting with Turkish gov officials --

324. G: Not just gov officials.

325. B: not sure can answer the question. Aware of comms with people who on its face may be Turkish.

326. G: But no express mention of Turkey or anything of the sort.

327. B: Recall some emails of people with Turkish names.

328. G: Shows Enver Bey and Burgrahan.

329. B: Yes, these are examples of people that I saw.

330. G: Mentioning Turkey is how I would put it.

331. G: Shows EDVA 821 (2/21) B remembers this one, 8741 (President Erdogan's visit to US - March 16, 10:43 am Osman to MF does recall this), 0000874 March 30 2016, 10:34 am Flynn to Osman - doesn't recall this)

332. G: did those emails come up in your convos with Bijan or Nolan or KV; anyone aside from MF?

333. B: Only conversations recall about these emails were internal.
334. G: Apart from MF, don't recall anything about these emails that were not internal.
335. ET: As far as lobbying goes, what information did you receive from Bijan about lobbying activities that he or Bijan had engaged in?
336. B: in interview of Jan 5 talked generally about activities; reacted to some of the docs that talked about the activities. Much later on, there were a number of interactions by email and primarily through Kristen in which he confirmed particular facts or relayed particular facts that ended up reflected in the FARA filing.
337. ET: What did he say about lobbying activities?
338. B: He confirmed things about dates, location, etc.
339. ET: to the best of your recollection who were there contacts?
340. B: the ones id'd in the FARA filing. Two meeting with Homeland security staffer = one at FIG and one on Hill. Also contacts at Sphere. Factually conveyed to us by Sphere's counsel. Those were media contacts and State contacts.
341. ET: Did he convey information about Rohrbacher or otherwise having contacts about Rohrbacher.
342. B: I remember that topic. Don't recall specific representations on the facts. Do not recall.
343. ET: what about convos, did MF tell you about any lobbying activity FIG had been engaged with and if so with whom?
344. B: He conveyed that the meetings had been done by Bijan.
345. ET: did he say with whom Bijan had contact?
346. B: Not that I recall.
347. ET: What about Ekim; did Nolan convey any information about lobbying activity that his client had been involved in.
348. B: Not that I recall in the sense that I don't believe he did.
349. ET: Funding for the project. What did Bijan tell you about how the project was funded?
350. B: Not much. Said knew that Ekim was a person of means. Successful businessman. Think that is it.
351. ET: Was that in the context of Ekim funding the project?
352. B: With respect to Inovo versus Ekim, recall him saying Ekim is Inovo and Inovo and Ekim.
353. ET: Did he mention, or make clear where the money for the project was coming from other than Ekim is wealthy?
354. B: No.
355. ET: What about MF. How did he describe the funding sources?
B: Don't recall him saying anything about the funding.
356. ET: Do you recall that arising in conversation?
357. B: I recall it coming up in the sense of money flows. And I don't recall MF saying anything about source of funds.
358. ET: Other than the memo you received from Nolan or other places this might be memorialized; any other convos with nolan about source of funding.

359. B: Believe came up in two of our calls. In the first of that conversation, he conveyed details about the ratio; they were an owner in Leviathan and that they had this arrangement with Ekim.
360. ET: What arrangement with Ekim?
361. B: Nolan described it as a private arrangement between Ekim and Ratio and that was the reason it hadn't been previously discussed with FIG. Described their interest, but can't remember how he described their interest -- Leviathan Project and interest in Turkey or words to that effect. There were some things he could not represent so we had a later conversation in which he had seen the Ratio contract, that he would not provide a contract, wouldn't cover the amount that it costs, but it was more than enough to cover the portion that was the FIG contract.
362. G: Was he saying that Ratio money was paying for FIG Contract?
363. B: He did not say that explicitly, but that it was more than enough to cover the FIG arrangement.
364. BVG: Nolan acknowledged that Ekim had not brought up Ratio to Bijan and Bijan also said he had not heard of the Ratio angle.
365. B: That's right. Bijan said he didn't know about Ratio until the press reports.
366. ET: When Nolan said he needed to get back to you, was because didn't know or needed permission.
367. B: Didn't know
368. ET: What did Bijan tell you about the origin of the op-ed.
369. B: Said it was MF's idea. Said talked frequently with MF about these types of activities. Bijan mentioned another op-ed with Woolsey. Had a flavorful title that stood out but escapes me now. That Bijan had worked with an editor, Hank Cox, to write the op-ed, or edit the op-ed. He expressed that it was not related to the project.
370. ET: Did Bijan say who wrote the first draft?
371. B: Do not believe he said who wrote first draft, though don't believe it came up. Recall MF saying that MF had sketched out the ideas, did not say whether on paper or orally, but Bijan did the first draft.
372. ET: Recall MF describing any other things around origin op-ed?
373. B: Described radical islam as something he has had an interest in. Described the working title: friend in need is a friend indeed. Described the op-ed in the geopolitical sense and why it was important --- that we were losing interest in Turkey and it was important to counteract. He expressed that the genesis of the op-ed, while not, under the project, had a connection to the project in the work they had been doing an assessment on Gulen, had caused him to think more about these issues. So the fact that he was working on the topic, had led him to pursue this.
374. ET: Did you receive any information from Nolan about op-ed before the FARA filing?
375. B: In the memo, he says something to the effect of "came to know about" or "didn't have a role in"; recall in a later conversation acknowledging what we had seen in the documentation of Ekim getting a draft.
376. ET: What did he say about that?
377. B: Think that acknowledging is the best description can give.

378. ET: Did he offer explanation?

379. B: Not that I can recall.

380. ET: Who other than attorneys at Cov reviewed draft of FARA filing?

381. B: Bijan through Kristen, MF, four or five people from FARA office. Counsel to Sphere reviewed the draft. Does not have the draft.

382. ET: What about Matthew Nolan?

383. B: Not from me.

384. ET: What factual comments did Bijan provide to the draft?

385. B: A handful. two sets of comments that precede the actual draft. Payment to an intern that was not related to project and didn't need to included; series of facts for short form; recall those being before actual full draft. On the full draft, several comments; first one reference to a business conference -- clarified that didn't attend it. That fact had come from some documentation that was forard looking. He clarified it didn't happen. Already talked about characterizaiton of consulting payments. Provided in a couple of iteratations clarifying which members of congress, what dates, things like that. And then on the short form he objected to language that's in a FN of the form itself; clarified for him it was the form and not something had put there.

386. ET: On kickbacks?

387. B: He said it was something to that: I object to my political contributions being characterized as kickbacks. Ekim's nationality -- one of the drafts referenced Ekim's nationality and Bijan corrected that.

388. ET: What was correction.

389. B: Was not a dual citizen, I think. Not recalling anything more.

390. ET: Recall comments and clarifications that MF offered?

391. B: Does not recall any edits, corrections from MF.

392. ET: What about from Sphere's counsel.

393. B: Yes, they were more minute and numerous. They specifically related to making sure that we and they had the best representation of the meetings and who was at what meetings, when were they, that sort of thing. Also offered some edits around, a phrase "at Inovo's request" pointed out that there wasn't a factual basis for that. Suggested an edit for Gulenopoly which we didn't take. Certain that there was more. Also had an edit about how to reference Sphere versus SGR.

394. ET: Any questions about factual information that haven't asked about?

395. G: Going to send a letter about where going think about.